

# Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X Index No.:  
ALIDA NORA ORIHUELA,

Plaintiff,

Plaintiff designates  
QUEENS County as  
Place of Trial  
Basis of venue is:  
Place of Occurrence and  
Plaintiff's Residence

-against-

TARGET CORPORATION,

**SUMMONS**


Plaintiff resides at:  
Defendant. 38-15 Bowne Street  
-----X Flushing, NY 11354

To the above named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: August 18, 2023

DAVID HOROWITZ, P.C.  
Attorney for Plaintiff

  
By: \_\_\_\_\_  
JOANNA PLONSKA  
171 Madison Ave, Suite 1300  
New York, New York 10016  
(212) 684-3630

Defendant's Address:

TARGET: c/o CT Corporation System, 28 Liberty St, New York, New York 10005

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X  
ALIDA NORA ORIHUELA,  
Plaintiff,

-against-

**VERIFIED COMPLAINT**

TARGET CORPORATION,

Defendant.

-----X

Plaintiff, complaining of the defendant, by her attorney,  
DAVID HOROWITZ, P.C., respectfully alleges:

1. Upon information and belief, at all times herein mentioned, defendant, TARGET CORPORATION, was a foreign corporation, conducting business in the State of New York.

2. Upon information and belief, on September 21, 2021, defendant, TARGET CORPORATION, owned the premises 4024 College Point Blvd, Queens, New York.

3. Upon information and belief, on September 21, 2021, defendant, TARGET CORPORATION, leased the premises 4024 College Point Blvd, Queens, New York.

4. Upon information and belief, on September 21, 2021, defendant, TARGET CORPORATON, was the owner of the discount store at the premises 4024 College Point Blvd, Queens, New York, known as Target.

5. Upon information and belief, on September 21, 2021, defendant, TARGET CORPORATON, operated the discount store at the

premises 4024 College Point Blvd, Queens, New York, known as Target.

6. Upon information and belief, on September 21, 2021, defendant, TARGET CORPORATON, maintained the discount store at the premises 4024 College Point Blvd, Queens, New York, known as Target.

7. Upon information and belief, on September 21, 2021, defendant, TARGET CORPORATON, managed the discount store at the premises 4024 College Point Blvd, Queens, New York, known as Target.

8. Upon information and belief, on September 21, 2021, defendant, TARGET CORPORATON, supervised the discount store at the premises 4024 College Point Blvd, Queens, New York, known as Target.

9. Upon information and belief, on September 21, 2021, defendant, TARGET CORPORATON, controlled the discount store at the premises 4024 College Point Blvd, Queens, New York, known as Target.

10. That on September 21, 2021, plaintiff ALIDA NORA ORIHUELA was a business invitee and lawfully at the Target store at 4024 College Point Blvd, Queens, New York.

11. That on September 21, 2021, at approximately 3:00 P.M.,

as plaintiff was walking near the refrigerators adjacent to "Section 31", she was caused to slip and fall on an accumulation of a slippery substance, thereby sustaining serious and severe permanent personal injuries due to the negligence of the defendant, its agents, servants, and/or employees.

12. That the negligence of the defendant TARGET CORPORATION, its agents, servants and /or employees consisted in the negligent ownership, operation, maintenance, management, supervision, inspection, and control of the premises; in causing and creating a dangerous condition conducive to causing injury to those lawfully on the premises; in causing and permitting a dangerous condition to exist; in setting a trap for plaintiff; in failing to inspect; in failing to mop and clean the floor; in failing to have a proper cleaning regiment; in permitting and/or allowing the floor to be wet, slippery and hazardous; in failing to keep the floor dry; in failing to clean and dry the floor; in failing to put up signs; in failing to block off the area; in failing to warn; in failing to provide for the safety of customers; in failing to give notice to plaintiff; in failing to mop and dry the area despite notice; in failing to keep the business premises from dangerous conditions; in failing to make the area safe; in failing to protect plaintiff; in failing to place warning signs where they were

visible; in failing to provide for the safety of customers; in failing to protect those lawfully on the premises; in causing, permitting and creating a dangerous slippery condition; in failing to have sufficient personnel to mop the floor; in failing to train and supervise its personnel; in failing to properly inspect; in failing to dry the floor despite notice; and in failing to avoid the occurrence although there was an opportunity to do so.

13. That the said plaintiff, ALIDA NORA ORIHUELA, by reason of the foregoing, sustained injuries to her body, rendering plaintiff sick, sore, lame and disabled; that plaintiff was required to and did expend money for medical aid and assistance; that plaintiff was unable to attend to her usual vocation or activities; and that plaintiff was otherwise damaged.


14. That this case falls within one of the exceptions enumerated in CPLR 1602.

15. That by reason of the foregoing, plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against the defendant in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: New York, New York  
August 18, 2023

Yours, etc.  
DAVID HOROWITZ, P.C.

By:   
JOANNA PLONSKA  
Attorney for Plaintiff  
171 Madison Avenue, 1300  
New York, New York 10016  
(212) 684-3630

**ATTORNEY'S VERIFICATION**

**JOANNA PLONSKA**, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury: I am an attorney at DAVID HOROWITZ, P.C., attorneys of record for Plaintiff(s) **ALIDA NORA ORIHUELA**. I have read the annexed **SUMMONS AND COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters, I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

This verification is made by me because my Plaintiff(s) is/are not presently in the county wherein I maintain my offices in Richmond County.

Dated: New York, New York  
August 18, 2023



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JOANNA PLONSKA



**Index No.**

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS**

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**ALIDA NORA ORIHUELA,**

**Plaintiff,**

**-against-**

**TARGET CORPORATION,**

**Defendant.**

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**SUMMONS AND VERIFIED COMPLAINT**

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**DAVID HOROWITZ, P.C.**

*Attorneys for Plaintiff*

**171 Madison Avenue, Suite 1300**

**New York, New York 10016**

**(212) 684-3630**

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*Pursuant to 22 NYCRR 130 1.1., the undersigned, an attorney admitted to practice in the courts of the State of New York, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.*

*Dated: August 18, 2023*



**JOANNA PLONSKA, ESQ.**

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